

Morse, Bob

From: Morse, Bob
Sent: Wednesday, March 20, 2019 12:18 PM
To: Randy.W.Battaglia@usace.army.mil
Cc: Pocze, Doug; Vazquez, Julio
Subject: FW: Draft 2017 LTM Annual Report for SEAD-25
Attachments: 10-cv-9101.pdf

Randy,

Below is Julio's September 2018 email re the 2017 Report, along with his original attachment. I guess there were some exceptions to the halting of monitoring in the 2017 report, which he reiterated. I'm not sure what he meant by 5 Year Review decisions. We don't use Five Year Review decisions to memorialize such a request. We might concur on a such a request in commenting on the 5 yr review, but that doesn't finish things. Some other form of documentation and EPA concurrence is needed. Are there any other outstanding ROD requirements? That would affect the Army documentation needed and the format of EPA concurrence. What happens with PFAS might also affect things. I suggest checking with your attorneys at some point to determine the proper course of action to discontinue monitoring. I hope this helps.

Bob

From: Vazquez, Julio
Sent: Thursday, September 13, 2018 4:56 PM
To: Battaglia, Randall W CIV USARMY CENAN (US) <Randy.W.Battaglia@usace.army.mil>
Cc: Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>; Sergott, Mark S (HEALTH) <mark.sergott@health.ny.gov>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Morse, Bob <Morse.Bob@epa.gov>
Subject: Draft 2017 LTM Annual Report for SEAD-25

Randy,

After review of the subject document dated June 2018, we concur that the levels of contamination have decreased significantly, and that the halting of the LTM sampling with the exceptions mentioned, i.e., emerging contaminants and 5 Year Review decisions, may be technically acceptable. However, the ROD language asks to "conduct groundwater monitoring of the plume for COCs until NYSDEC Class GA standards are achieved." In order to halt the groundwater monitoring for SEAD-25 as per the subject document recommendation, some type of administrative effort would be needed to change the ROD requirement.

Please find attached EPA guidance on documenting Post-ROD changes for your reference.

VR,

Julio F Vazquez

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